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**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION,

This Document Relates To:  
  
ALL ACTIONS

MDL No. 3047

Case No. 4:22-md-03047-YGR (PHK)

**DECLARATION OF NOREEN YEH IN  
SUPPORT OF OMNIBUS SEALING  
STIPULATION REGARDING JOINT  
LETTER BRIEF**

I, Noreen Yeh, declare and state as follows:

1. I am an electronic discovery analyst at TikTok, Inc.

2. I submit this declaration in support of the Omnibus Sealing Stipulation Regarding the Parties' Joint Letter Brief on Whether TikTok Must Produce Specified Personnel Materials for Deponents. I make this declaration based upon my personal knowledge, unless stated otherwise, and if called upon to do so, I could and would so testify.

3. The following portion of the Parties' Joint Letter Brief on Whether TikTok Must Produce Specified Personnel Materials for Deponents (the "JLB") (filed with redactions at ECF No. 1126) contains references to confidential information.

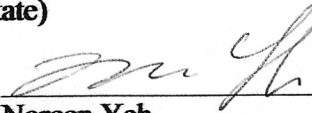
Paragraphs to Be Sealed	Language to Be Redacted
Portion of Footnote 7	The name of an employee of the TikTok Defendants.

4. The information sought to be redacted consists of the name of an employee of the TikTok Defendants who is not a party to this litigation. The other information to be unsealed in this footnote and the corresponding paragraph relate to the TikTok Defendants' practices with respect to employee compensation, discipline, and evaluations. The names of TikTok Defendants' employees and certain information related to compensation, discipline, and evaluations are not disclosed publicly in the ordinary course of business.

5. Further, disclosure of the employee's name in the context of the TikTok Defendants' practices with respect to employee compensation, discipline, and evaluations would violate the employee's privacy.

1 I declare under penalty of perjury that the foregoing is true and correct.

2 Executed on January 30, 2025, at New York, NY.  
3 (city, state)

4   
5 Noreen Yeh

Respectfully submitted,

**KING & SPALDING LLP**

/s/ Geoffrey M. Drake

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